

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GEOFF TURNER, as Business Manager and on behalf of INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 1200, AFL-CIO,	:	Civil Action No.
	:	21-CV-03766
Petitioner,	:	
CBS BROADCASTING INC.,	:	
Respondent.	:	

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PROTECTIVE ORDER

WHEREAS, Petitioner Geoff Turner, as Business Manager and on behalf of the International Brotherhood of Electrical Workers Local 1200, AFL-CIO (the “Petitioner”) filed a Petition to enforce an arbitration subpoena (the “Subpoena”) issued in an underlying arbitration (AAA No. 01-20-0015-7503) (the “Arbitration”) between Petitioner and CBS Broadcasting Inc. (“CBS”);

WHEREAS, CBS opposed the Petition;

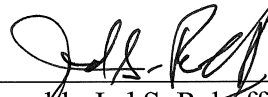
WHEREAS, after having reviewed the parties’ written submissions and heard oral argument, the Court has granted the Petition, subject to the terms of this Protective Order;

NOW IT IS HEREBY ORDERED that:

1. Production of materials responsive to the Subpoena (the “Production”) shall be made by CBS to counsel for Petitioner;
2. Counsel for Petitioner may contact non-parties to the Arbitration referenced in the Production but may not disclose, to Petitioner or any other person or entity, the names of nonparties to the Arbitration referenced in the Production; and
3. To the extent that counsel for Petitioner wishes to show any portion of the Production to any person or entity and can do so without violating any agreement or order issued

in the Arbitration, Petitioner may do so provided that either: 1) the non-party voluntarily appears as a witness in the Arbitration proceeding; or 2) counsel for Petitioner first redacts names of all nonparties to the Arbitration that do not voluntarily appear as witnesses in the Arbitration proceeding that are referenced in the portion of the Production being shown.

DATED: 5/2, 2022



Honorable Jed S. Rakoff
United States District Judge